

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

La Unión Del Pueblo Entero, *et al.*,

Plaintiffs,

v.

Gregory W. Abbott, *et al.*,

Defendants.

No. 5:21-cv-00844-XR

**INTERVENOR-DEFENDANTS' RESPONSES AND OBJECTIONS TO
UNITED STATES' RULE 26(a)(3) DISCLOSURES**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (collectively, the “Intervenor-Defendants”), lodge the following responses and objections to the Rule 26(a)(3) pretrial disclosures filed by the United States. *See* ECF No. 684.

Intervenor-Defendants expressly join, and incorporate herein by reference, all responses and objections lodged to the United States’ pretrial disclosures by any party to this litigation, including State Defendants. Intervenor-Defendants also expressly reserve the right to supplement, modify, or add to these responses and objections.

United States' Deposition Designations For Hilda Salinas (April 20, 2023)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
152:3-9	Fed. R. 602 (lack of personal knowledge), lack of foundation	

United States' Deposition Designations For Christina Adkins (July 20, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
152:3-9	Lack of personal knowledge, lack of foundation	

United States' Deposition Designations For Jacquelyn Callanen (April 4, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
58:17-60:11	Vague question; Fed. R. Evid. 701 (improper opinion testimony)	
83:13-85:11	Fed. R. Evid. 701 (improper opinion testimony)	
110:2-11	Fed. R. Evid. 602 (lack of personal knowledge)	
126:2-5	Fed. R. Evid. 701 (improper opinion testimony), lack of foundation	
142:25-143:12	Fed. R. Evid. 802 (hearsay); Fed. R. Evid. 602 (lack of personal knowledge)	

United States' Deposition Designations For Jacquelyn Callanen (30(b)(6)) (April 4, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
139:15-22	Fed. R. Evid. 802 (hearsay), Fed. R. Evid. 602 (lack of personal knowledge)	
278:23-25	Fed. R. Evid. 701 (improper opinion testimony)	
282:9-11	Vague question	

United States' Deposition Designations For Jacquelyn Callanen (30(b)(6)) (February 28, 2023)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
110:19-21	Fed. R. Evid. 602 (lack of personal knowledge), call for speculation	
120:6-10		120:11-22
132:21-134:21	Fed. R. Evid. 802 (hearsay)	

United States' Deposition Designations For Jennifer Colvin (30(b)(6)) (March 21, 2023)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
48:23-49:10	Fed. R. Evid. 602 (lack of personal knowledge), speculation	
81:2-81:19	Fed. R. 802 (hearsay)	
83:2-9	Fed. R. 802 (hearsay)	

United States' Deposition Designations For Dana DeBeauvoir (March 21, 2023)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
38:16-18	Fed. R. Evid. 602 (lack of personal knowledge), lack of foundation	
39:23-40:3	Fed. R. Evid. 602 (lack of personal knowledge), lack of foundation	
42:15-43:4	Fed. R. Evid. 802 (hearsay), Fed. R. Evid. 602 (lack of personal knowledge)	
46:5-13	Fed. R. Evid. 802 (hearsay), Fed. R. Evid. 602 (lack of personal knowledge)	
162:14-163:7	Fed. R. Evid. 802 (hearsay)	

United States' Deposition Designations For Keith Ingram (April 28, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
25:2-8		25:9-11, 27:9-18
79:15-22		79:23-80:18
85:22-87:1	Fed. R. Evid. 701 (improper opinion testimony), Fed. R. Evid. 602 (lack of personal knowledge)	
87:20-23	Fed. R. Evid. 701 (improper opinion testimony), Fed. R. Evid. 602 (lack of personal knowledge)	

United States' Deposition Designations For Keith Ingram (April 28, 2023)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
100:2-6		100:7-9
111:20-112:6		112:7-21
119:21-24	Fed. R. Evid. 602 (lack of personal knowledge), speculation	

United States' Deposition Designations For Keith Ingram (30(b)(6)) (April 26, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
26:7-27:20; 27:24-29:1	Fed. R. Evid. 401 (relevance)	
35:10-37:4	Fed. R. Evid. 802 (hearsay)	

United States' Deposition Designations For Charlton Johnson (30(b)(6)) (March 29, 2023)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
40:24-41:4	Fed. R. Evid. 802 (hearsay)	
82:10-18	Speculation	

United States' Deposition Designations For Charlton Johnson (30(b)(6)) (May 11, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
19:1-6	Fed. R. Evid. 602 (lack of personal knowledge)	19:7-10
82:10-18	Speculation	

United States' Deposition Designations For Isabel Longoria (Defs) (April 20, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
30:12-32:14	Fed. R. Evid. 602 (lack of personal knowledge), speculation, Fed. R. Evid. 802 (hearsay)	
38:2-8	Fed. R. Evid. 701 (improper opinion testimony on legal question)	
127:13-128:17	Fed. R. Evid. 802 (hearsay)	
131:9-19	Fed. R. Evid. 802 (hearsay)	

United States' Deposition Designations For Isabel Longoria (Pls) (April 20, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
44:11-45:6	Fed. R. Evid. 602 (lack of personal knowledge), speculation	

55:9-11	Fed. R. Evid. 602 (lack of personal knowledge), lack of foundation	
57:1-9	Fed. R. Evid. 602 (lack of personal knowledge), lack of foundation	
61:17-22	Fed. R. Evid. 802 (hearsay)	
107:15-109:10	Fed. R. Evid. 602 (lack of personal knowledge)	

United States' Deposition Designations For Rachelle Obakozuwa (30(b)(6))
(March 21, 2023)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
58:8-18	Fed. R. Evid. 602 (lack of personal knowledge), speculation, Fed. R. Evid. 802 (hearsay)	

United States' Deposition Designations For Frank Phillips (March 31, 2023)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
46:4-16	Fed. R. Evid. 802 (hearsay)	
93:15-20	Vague question, Fed. R. Evid. 602 (lack of personal knowledge), lack of foundation	

United States' Deposition Designations For Yvonne Ramon (April 21, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
170:5-25	Fed. R. Evid. 602 (lack of personal knowledge), lack of foundation	

United States' Deposition Designations For Yvonne Ramon (30(b)(6)) (May 10, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
66:7-12	Fed. R. Evid. 701 (improper opinion testimony on legal question)	

United States' Deposition Designations For Michael Scarpello (May 5, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
49:23-50:2		51:18-21

United States' Deposition Designations For Jonathan White (April 27, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
81:11-18	Argumentative question, vague question, call for speculation	

United States' Deposition Designations For Lisa Wise (April 13, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
119:15-120:1	Fed. R. Evid. 802 (hearsay)	
139:1-8	Vague question	
207:24-208:3		208:4-9

United States' Deposition Designations For Lisa Wise (30(b)(6)) (April 15, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
39:1-20	Fed. R. Evid. 602 (lack of personal knowledge), lack of foundation	
100:18-102:9	Fed. R. Evid. 602 (lack of personal knowledge), lack of foundation	
105:6-106:14	Fed. R. Evid. 802 (hearsay)	
107:22-110:1	Fed. R. Evid. 602 (lack of personal knowledge), lack of foundation, calls for speculation	
110:6-19	Fed. R. Evid. 602 (lack of personal knowledge), Fed. R. Evid. 802 (hearsay)	
112:8-114:25	Fed. R. Evid. 602 (lack of personal knowledge), Fed. R. Evid. 802 (hearsay)	

United States' Deposition Designations For Lisa Wise (30(b)(6)) (April 18, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
89:12-90:3	Fed. R. Evid. 602 (lack of personal knowledge), Fed. R. Evid. 802 (hearsay)	
97:10-22	Vague question	
105:1-23	Fed. R. Evid. 602 (lack of personal knowledge)	
109:23:110:4	Fed. R. Evid. 602 (lack of personal knowledge), Fed. R. Evid. 701 (improper opinion testimony on legal question)	
110:12-18	Fed. R. Evid. 602 (lack of personal knowledge), Fed. R. Evid. 701 (improper opinion testimony on legal question)	
112:6-21		112:22-24
149:16-25	Fed. R. Evid. 602 (lack of personal knowledge), speculation	

United States' Deposition Designations For Tacoma Phillips (30(b)(6)) (April 29, 2022)

<u>United States' Designation</u>	<u>Intervenor-Defendants' Objection</u>	<u>Intervenor-Defendants' Counter Designation</u>
180:3-15	Fed. R. Evid. 602 (lack of personal knowledge), speculation	
180:16-21	Fed. R. Evid. 802 (hearsay)	

August 15, 2023

Respectfully submitted,

/s/ John M. Gore

John M. Gore

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CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to all counsel of record.

/s/ John M. Gore